



Modern Slavery Statement FY25

1 July 2024 - 30 June 2025



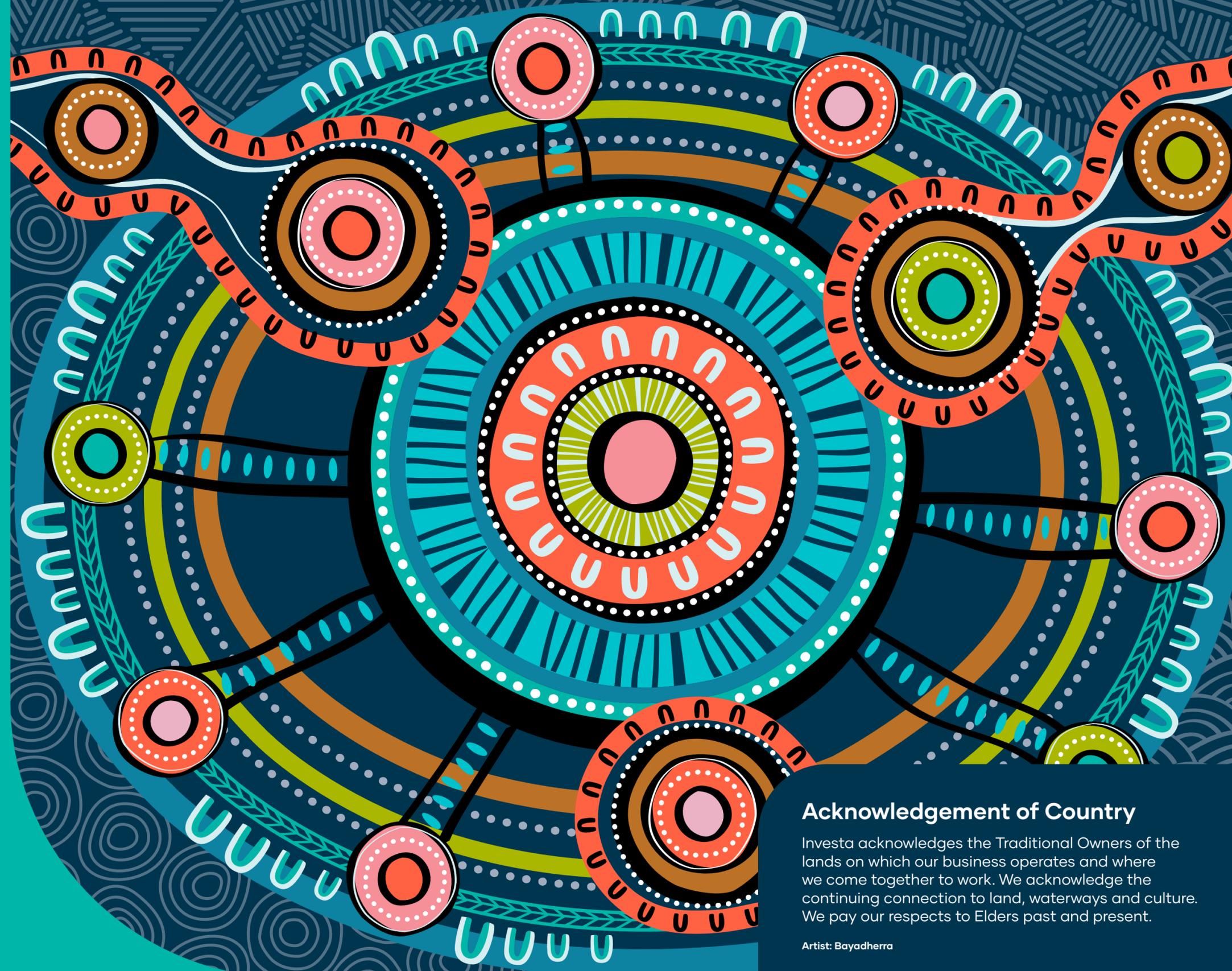
Contents

- 03 About this Statement**
- 04 CEO message**
- 05 Investa**
 - 05 Our structure and operations
 - 06 Our business in numbers
 - 06 What we do
 - 07 Our supply chains
- 08 Our modern slavery risks**
 - 08 How we assess our modern slavery risks
 - 09 Our operational risks
 - 09 Our supply chain risks
- 10 Taking action**
 - 10 How we address our modern slavery risks
 - 11 Our governance
 - 12 Our policies
 - 13 Our supplier risk management
 - 15 Our stakeholder engagement approach
 - 16 Our grievance management and remediation approach
- 17 How we assess the effectiveness of our actions**
- 18 Our approach to date**
- 19 Appendix**
- 20 Contact**

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Acknowledgement of Country

Investa acknowledges the Traditional Owners of the lands on which our business operates and where we come together to work. We acknowledge the continuing connection to land, waterways and culture. We pay our respects to Elders past and present.

Artist: Bayadherra



About this Statement

This Modern Slavery Statement (Statement) is made under the Australian Modern Slavery Act 2018 (Cth) (the MSA) by Investa Wholesale Funds Management Limited (IWFML) ACN 149 681 390 as responsible entity for the Investa Commercial Property Fund (ARSN 103 041 505) and ICPF Holdings Limited (ACN 610 989 805), the stapled securities known as ICPF Group or ICPF (ICPF).

ICPF is a reporting entity for the purposes of the MSA. The scope of this Statement also includes Investa Gateway Offices (IGO)¹, a commercial property fund managed by Investa.² The reporting period covered by this Statement is 1 July 2024 to 30 June 2025.

In this Statement, a reference to 'Investa' relates to ICPF, IGO, Investa Management Holdings Pty Limited (IMH) and its subsidiaries. The policies, processes and actions described in the Statement apply across Investa's corporate structure unless indicated otherwise. The table in Appendix A identifies how this Statement addresses each of the mandatory criteria set out in the MSA.

Consultation

Consultation was undertaken with relevant owned or controlled entities as appropriate. As part of the consultation process with owned or controlled entities, the Statement was reviewed and approved by the Board of IMH, since IMH is the head entity of the Investa management platform, which has responsibility for the management of the properties, operations and developments on behalf of ICPF and IGO.

In addition to the consultation processes outlined above, our cross-functional Responsible Procurement Working Group and broader governance frameworks as described in this Statement support us to engage across Investa to implement our modern slavery response.

Approval and signature

This Statement was approved by the Board of IWFML on 28 November 2025 as the responsible entity for ICPF, and has been signed by Rebecca McGrath in her capacity as a director of IWFML.



Rebecca McGrath

Independent Director Investa Management Holdings Pty Ltd and Chairman of Investa Wholesale Funds Management Limited

28 November 2025

1. Investa Custodian (1) Pty Ltd (ACN 005 752 910) as trustee of the Australia Office Fund Investment I Trust (ABN 36 360 783 944) known as 'Investa Gateway Offices' (IGO).
2. IGO is not a reporting entity for the purposes of the MSA.



CEO message



As Investa celebrates 25 years of welcoming the world to better places, we recognise the role we play in monitoring and managing potential risks across the buildings we invest in and operate. Fostering a safe and equitable supply chain is a core commitment we make to our people and to our customers.

We work with a diverse range of suppliers to procure goods and services to support our business operations, property management and investment management functions. In FY25, our total supplier spend, across our platform, developments and managed buildings was approximately \$1.16b.³

This year's Modern Slavery Statement – our sixth to date – details our ongoing efforts to assess and address our modern slavery risks. Over the past financial year, we continued to actively monitor our suppliers' modern slavery risk management, inviting our higher risk suppliers to undertake due diligence surveys and track their progress and responses.

We continue to work closely with our peers through the Property Council of Australia (PCA) to support sector-wide action, including contributing to the development of new guidance documents and resources for the property industry to support wider industry understanding and ability to address human rights and modern slavery risks in our operations and supply chains.

To help inform our ongoing work in addressing modern slavery risks, we also identified industry sectors to focus on future audits and commenced engagement with a third-party audit firm to support further deep dives into our supply chain.

Our efforts in progressing employee and customer education on modern slavery are a key focus area for us and we provide information on our modern slavery approach to employees and customers in our education series, tenant sustainability meetings and reporting.

We understand the importance of continuous improvement and will work to refine our modern slavery response. Our key priorities for the next financial year include:

- Seeking to understand our supply chain more deeply through supplier audits
- Expanding our responsible procurement approach to include material issues intersecting with modern slavery into our supplier due diligence
- Finalising and implementing guidance about responding to modern slavery grievances
- Implementing and tracking key KPIs to enhance our understanding of our effectiveness
- Progressing employee and customer education on modern slavery.

Peter Menegazzo
CEO, Investa

³. The total FY25 supplier spend referred to is based on invoices paid for services and products to Investa management platform, its managed buildings and developments.



Investa

Investa is a progressive Australian real estate investment manager, developer and operator, with \$14.4 billion⁴ of assets under management.

We are committed to creating exceptional places, experiences and communities for our customers in innovative and award-winning spaces that shape our future cities. Our ESG ambition is to create positive impact across, within, and around our managed portfolio, including by taking action to address modern slavery risks.

Investa's management platform provides investment, property, facilities and development management services to support a range of investment portfolios, as well as joint ventures, external mandates and private real estate clients.

Our managed buildings provide premium workplaces and homes for customers across a number of Australia's major cities. Our integrated platform provides an investment and property management approach that supports the full property lifecycle – from acquisition and development through to day-to-day operations and investment management.

This year we expanded the managed investments and managed buildings in our portfolio, with the acquisition of Sydney office assets on behalf of investment mandate clients. Another key development was the completion of the first of our Indi build to rent developments, with Indi Sydney becoming operational in December 2024.

Our purpose to welcome the world to better places guides how we create and curate environments that enhance the lives of our people, investors, tenants and residents.

Our structure and operations

Investa operates solely in Australia and is headquartered in Sydney. IMH is jointly owned by ICPF and Oxford Properties. The Investa platform manages our clients' property investments through the following entities:

Investa Management Holdings (IMH)

IMH is a real estate investment manager, developer and operator that acquires, develops and manages real estate assets on behalf of our clients. IMH has \$14.4 billion⁴ of assets under management (AUM). A subsidiary of IMH is the entity that employs Investa's staff.

IMH manages our two core funds.

Investa Commercial Property Fund (ICPF)

ICPF is a commercial property fund managed by Investa valued at A\$5.4 billion⁴ AUM. ICPF invests in 15 commercial buildings in Sydney, Melbourne, Canberra, Brisbane and Perth and is also undertaking development of office buildings in some of these markets. Investa Wholesale Funds Management Limited (IWFML) is the responsible entity of ICPF.

Investa Gateway Offices (IGO)

IGO is an institutionally owned commercial property fund managed by Investa. IGO owns a commercial property portfolio of 5 commercial office assets in Sydney and Melbourne valued at A\$1.8 billion⁴ AUM.

In addition to our managed funds (ICPF and IGO), Investa also offers specialised investment mandate management services tailored to meet the requirements and investment parameters of sophisticated investors such as corporations, sovereign wealth funds, pension funds and insurance groups.

⁴. Figure correct as at 30 September 2025.





Our business in numbers⁵



\$14.4b
AUM



29
Assets including development sites



616
Businesses we provide working spaces for



242
Team members across Australia



92% / 8%
Full time / part time employees



113 / 129
Male / female employees



13
Contractors

5. Figures correct as at 30 September 2025 including on completion value of commercial developments.

What we do

1

Investment Management

Our high-performing funds, based in Australia, provide institutional investors at home and offshore with real estate investment opportunities across Australia's real estate sector. Our funds and platform have \$14.4 billion AUM⁵.

- Funds Management
- Investment Management
- Capital Management
- Asset Management
- Trust Management
- Trust Accounting
- Compliance & Governance

2

Corporate

Our corporate services and operations support the business through a range of functions including legal and compliance, financial services, marketing and communication, and employee engagement and connection.

- Legal, Governance & Risk
- Information Technology
- Finance, Tax & Treasury
- Marketing & Communications
- People & Culture
- Transformation & Business Planning

3

Developments

Our development team has the capabilities to conceive, deliver and manage developments across multiple asset classes.

- Development Management
- New Business & Origination

4

Capital Transactions

Our capital transactions team source, investigate, transact, review and exit assets providing strategic advice and market insight.

- Buy / Sell Strategy
- Negotiations
- Due Diligence
- Deal Structure
- Transaction Management

5

Real Estate Operations

Our real estate management platform optimises the performance and returns of our assets, as well as the services we provide to our tenants, with consistent reporting, standards and processes.

- Property Management
- Facilities Management
- Occupant Experience
- Property Accounting
- Lease Administration
- Portfolio & Project Leasing
- Capital Project Management Oversight
- Environmental, Social & Governance
- Safety
- Building Technology
- Technical Services & Procurement



Our supply chains

We work with a diverse range of suppliers to procure goods and services to support our business operations, property management, development, capital works and investment management functions.

In FY25, our total supplier spend, across our platform, developments and managed buildings was approximately \$1.16b⁶. Our suppliers are primarily located in Australia, but we recognise they may also operate or source from other countries.

There were no significant changes to our procurement footprint over the reporting period.

Our key areas of procurement include:

Investment and funds management supply chain

Services that support funds management include:

- Financial and accounting services
- Professional services.

Real estate operations/property management supply chain

Services that support building operations include:

- Cleaning services
- Security services
- Waste services
- Property maintenance services and materials
- Building operations services such as lift and building management systems
- Financial and accounting services
- Professional services
- Energy and utility retailers
- Principal contractor services in capital works projects.

Development supply chain

Services that support development management include:

- Professional services
- Principal Contractor services.

Corporate supply chain

Products and services that support corporate business operations include:

- ICT systems and equipment such as computers and telephones
- Office furniture
- Office supplies and consumables
- Merchandise, apparel and PPE
- Advertising services
- Financial and accounting services
- Professional services.

Supply chain spotlight: The role of principal contractors

In some cases, we recognise that modern slavery may occur deeper in our supply chains beyond our direct suppliers, from tier 2 and below.

When we undertake a development or a capital works project, we engage a principal contractor to manage the project. The principal contractor is responsible for procuring any sub-contractors and the building labour force to support various construction tasks, as well as suppliers of construction materials such as concrete, steel, and glass. During the reporting period, we worked with over 21 principal contractors across more than 35 projects, in development and capital works.



6. The total supplier spend referred to is based on invoices paid for services and products to Investa management platform, its managed buildings and developments.

Our modern slavery risks

Modern slavery risks exist in the operations and supply chains of all businesses, including our own.

As highlighted by the New South Wales (NSW) Anti-Slavery Commissioner, the Australian infrastructure and property sector can involve a range of modern slavery risk areas.⁷ The Commissioner has identified that these risks include the use of higher risk materials, as well as potentially vulnerable workers such as lower skilled construction labourers.

We also recognise that modern slavery does not occur in isolation and can occur in conjunction with other forms of serious human rights harm, such as workplace harassment and discrimination, unsafe working conditions and environmental damage.

How we assess our modern slavery risks

Our approach to assessing our modern slavery risks is informed by the United Nations Guiding Principles on Business and Human Rights (UNGPs).

We use the UNGPs continuum of involvement to better understand how we might be involved with modern slavery. Although we have not identified any modern slavery incidents to date, we understand that a property management company may be involved in adverse human rights impact by:

- **Causing it directly through its own actions or omissions.**
For example, if it disregarded credible evidence of one of its service providers exploiting their workers.
- **Contributing to it through its own actions or omissions or through a third party (or parties).**
For example, if its purchasing practices put significant cost and time pressures on suppliers that could only be met through the use of forced labour.
- **Being directly linked to it through its business relationships arising from its products, services or operations.**
For example, if a principal contractor's sub-supplier or third party was to source building materials produced using exploited labour even though the development company had set clear requirements for responsible sourcing in its contract with the principal contractor.



We use a number of tools to help us identify and assess our exposure to modern slavery risks, as shown below.



⁷ 'Modern Slavery Risks in Construction: An Overview' published by the Office of the NSW Anti-Slavery Commissioner



OUR MODERN SLAVERY RISKS

Our operational risks

Based on factors such as the profile of our workforce, the context in which we operate, and learnings from engagement with our peers via the PCA Modern Slavery Working Group, we consider that the risk of modern slavery within our operations is low.

Importantly, our workforce is predominantly comprised of employees directly engaged in office-based environments and all our employees are located in Australia. Our employees also have written contracts and are employed in accordance with relevant workplace laws. Our workforce is also predominantly full-time and does not involve risk factors present in some other sectors, such as high levels of seasonal fluctuations in workforce numbers, large numbers of casual workers, or workers below the age of eighteen.

Our supply chain risks

We assess that our greatest exposure to modern slavery risks is through our supply chain. This reflects the types of workers and materials present in our supply chain. While our suppliers are primarily located in Australia, we recognise they may undertake manufacturing or sourcing activities in higher risk geographies outside Australia, or work with sub-suppliers who do so.

During the reporting period, we supported the development of a PCA guide for businesses titled 'Indicators of vulnerability to modern slavery in property and construction' (see page 15). The guide highlights that 'in the property and construction industries, unique factors amplify worker vulnerability'. These factors can include complex subcontracting arrangements and the presence of vulnerable groups in the construction workforce, such as temporary and low skilled workers who may also have English language barriers.

The table below explores where these risks may be directly linked to our business operations. When we consider these industry categories in our supply chain of purchased products and services, these suppliers comprise approximately 10% of our suppliers but contribute 72% to our overall spend in FY25.

	Potential modern slavery risk areas	Modern slavery risk also identified by NSW Anti-Slavery Commissioner ⁸	Modern slavery risk factors
 Corporate Operations	• Office suppliers and consumables		<ul style="list-style-type: none"> • High risk raw materials • Supplier competition to reduce costs
	• ICT equipment	Yes	<ul style="list-style-type: none"> • High risk raw materials • Production in higher risk geographies • Use of lower skilled migrant workers
	• Apparel and PPE	Yes	<ul style="list-style-type: none"> • Use of lower skilled migrant workers • Use of subcontracting and labour hire
 Property Management / Real Estate Operations	• Domestic and international travel and accommodation		<ul style="list-style-type: none"> • Use of subcontracting and labour hire
	• Cleaning services	Yes	<ul style="list-style-type: none"> • Use of subcontracting and labour hire • Work performed outside core business hours (reducing visibility of working conditions)
	• Security services	Yes	<ul style="list-style-type: none"> • Use of lower skilled migrant workers • Supplier competition to reduce costs
 Development	• Labour used for facilities management services		<ul style="list-style-type: none"> • High risk raw materials / renewable technologies • Production in higher risk geographies
	• Building technology and performance monitoring systems	Yes	
	• Building infrastructure, such as solar panels		<ul style="list-style-type: none"> • High risk raw materials / renewable technologies • Production in higher risk geographies
 Development	• On-site solar panels and renewable energy purchasing agreements	Yes	
	• Construction labour: where the principal contractor engages subcontractors which may have low skilled manual labour, temporary migrant workers, third party contractors to trades	Yes	<ul style="list-style-type: none"> • Use of subcontracting and labour hire • Work performed outside core business hours (reducing visibility of working conditions) • Use of lower skilled migrant workers • Supplier competition to reduce costs
 Development	• Construction materials where the principal contractor engages subcontractors, such as solar panels, steel, concrete, glazing/façade, mechanical plant	Yes	<ul style="list-style-type: none"> • High risk raw materials / renewable technologies • Production in higher risk geographies • Use of lower skilled migrant workers • Supplier competition to reduce costs

8. Refers to products or services assessed as 'high risk' by the Office of the NSW Anti-Slavery Commissioner in the Modern Slavery Inherent Risk Identification Tool.



Taking action

How we address our modern slavery risks

We are taking a range of steps to address our modern slavery risks.



Governance

Our governance framework guides our response to modern slavery and defines internal responsibilities for managing modern slavery risks.



Policies

Our policies set out our expectations and requirements for our people and our suppliers in relation to modern slavery.



Supplier management

Our supplier management approach is guided by our Supplier Code of Conduct, which is reviewed annually and includes a range of modern slavery controls and is also informed by collaboration with our peers through the PCA Modern Slavery Working Group.



Stakeholder engagement

We engage with internal stakeholders around modern slavery, including through training. We also engage with external stakeholders (including investors and tenants) and our peers in the property sector, on a range of issues including modern slavery.



Grievance mechanisms and remediation

We have plans in place to guide our response to a modern slavery allegation in line with the UNGPs.





Investa Executive Committee

Our governance

Our approach to modern slavery is guided by our Human Rights and Modern Slavery Framework (the Framework), established in 2021.

As part of our work to implement the Framework, we have allocated responsibility for modern slavery risk management across our governance structure. Our approach to modern slavery risk management, including our governance structure, was reviewed through an internal audit in FY24. Through this process, we identified key actions to strengthen our modern slavery response, which were completed during FY25.



Our policies

Our modern slavery governance is supported by a suite of policies that set expectations and requirements for our people and our suppliers in relation to modern slavery. Where relevant, these policies also address broader human rights issues.



Human Rights Policy

Outlines Investa's commitment to respect human rights, including working towards ensuring modern slavery does not exist in our operations and supply chains. The Human Rights Policy is the basis for embedding our responsibility to respect human rights across our business functions.



Supplier Code of Conduct

Outlines Investa's commitment to conducting its business in an ethical, legal, and professional manner. It sets out our expectations for suppliers to similarly operate in an ethical, legal, and professional manner, and in accordance with labour and broader human rights standards, including those relating to modern slavery. Among other requirements, the Supplier Code prohibits the use of child or forced labour or compelling employees to lodge deposits or hand over their identity papers.



Third Party Risk Management Framework

Sets out Investa's approach to managing third-party supplier risks. The framework sets out a risk-based approach to identifying, assessing and managing risks inherent in third party supplier engagements, including the risk of modern slavery in our supply chains.



Sustainability Policy

Sets out Investa's commitment to ensuring sustainability is considered in every aspect of business operations. This includes addressing and mitigating supply chain risks.



Whistleblower Policy

Provides employees and suppliers' workers the ability to raise concerns, without repercussions, about actual or suspected misconduct (which could include modern slavery). The policy provides details on how to make a report on an open or anonymous basis. More detail about our approach to grievances and remediation is set out later in this statement.



Procurement Policy

This policy outlines Investa's principles, commitments and approach to responsible procurement of goods and services.

The Policy is guided by a range of principles, which include managing compliance risks for the business and employees by adhering to relevant legislation, regulations, standards including but not limited to ISO 20400:2017 – Sustainable Procurement-Guidance and business procedures. The policy considers price, value, safety and risks (including modern slavery risk assessments) as well as social and environmental impacts.

Our Human Rights Policy is published on our website and staff intranet. The policy is reviewed annually.

The Supplier Code of Conduct is published on our website. Our suppliers are requested to acknowledge and attest that they will comply with our Code. The Supplier Code of Conduct is reviewed annually.

The Third Party Risk Management Framework is published on our staff intranet. We review the framework on a periodic basis

Our Sustainability Policy is published on our website. The policy is reviewed annually.

Our Whistleblower Policy is available on our website. Signage located at key back of house locations in our buildings provides suppliers with details of our Whistleblower contact line, and is translated in the seven most commonly spoken languages by our contractors, including Nepali, Spanish, Thai, Hindi, Bengali, Portuguese and Arabic.

The Procurement Policy is practically delivered through Investa's procurement procedures and other related policies. These procedures and policies outline the procurement processes and standards required to be adhered to by all staff and are located on Investa's document management system.

Refining our policy framework

We review and update key policies as appropriate to help ensure they remain fit for purpose. During the reporting period, we reviewed the content of our Human Rights Policy, Sustainability Policy, Supplier Code of Conduct and the Procurement Policy. As part of this process, we updated the Supplier Code to reflect our grievance and notification mechanisms and enhanced supply chain management systems and processes. We also updated our Sustainability Policy, which included integration of the Investa Environment Policy. We also reviewed our Procurement Policy and procedures across Investa's business units.



Our supplier risk management

Managing modern slavery risks relating to our suppliers is a key element of our modern slavery response. Our focus on our suppliers reflects that our most severe modern slavery risks are likely to occur in our supply chain.

Our approach to managing modern slavery risks across our direct supplier base includes the following key actions which apply to relevant suppliers across key stages of the supplier lifecycle:



Supplier contracting, including modern slavery attestation

Where appropriate, our supplier and tender briefs include modern slavery and other responsible procurement-related requirements.

As part of the supplier onboarding process, we request direct suppliers to make an attestation that they will comply with our Supplier Code of Conduct and the MSA. We have also incorporated sustainable procurement clauses into our standard Terms and Conditions. Among other things, these clauses require that in the performance of its obligations, the Supplier and its operations will comply with applicable provisions of the MSA, where required by applicable law to have processes in place to review its modern slavery practices and to ensure it conducts its business in alignment with the principles and objectives of the laws in relation to modern slavery.



Supplier due diligence surveys

We use a modern slavery due diligence survey to help us monitor and assess risks in our supply chains. Higher risk direct suppliers are requested to complete the survey, which includes a series of questions related to modern slavery, such as the geographies involved in our suppliers' supply chains and any risk assessments undertaken by suppliers. The surveys are administered by Informed 365 as part of the PCA's supplier platform.

During the reporting period, we revised our approach to supplier surveys to focus on suppliers from high-risk industries. We also included additional filters to account for the duration of our relationship with the supplier and our level of spend. This year supplier completion of modern slavery due diligence surveys reduced from 40% in FY24 to 34% in FY25. This may reflect a higher number of Investa suppliers invited to participate in the survey and potential supplier survey fatigue with an increase in frequency of supplier survey distributions within the survey platform.

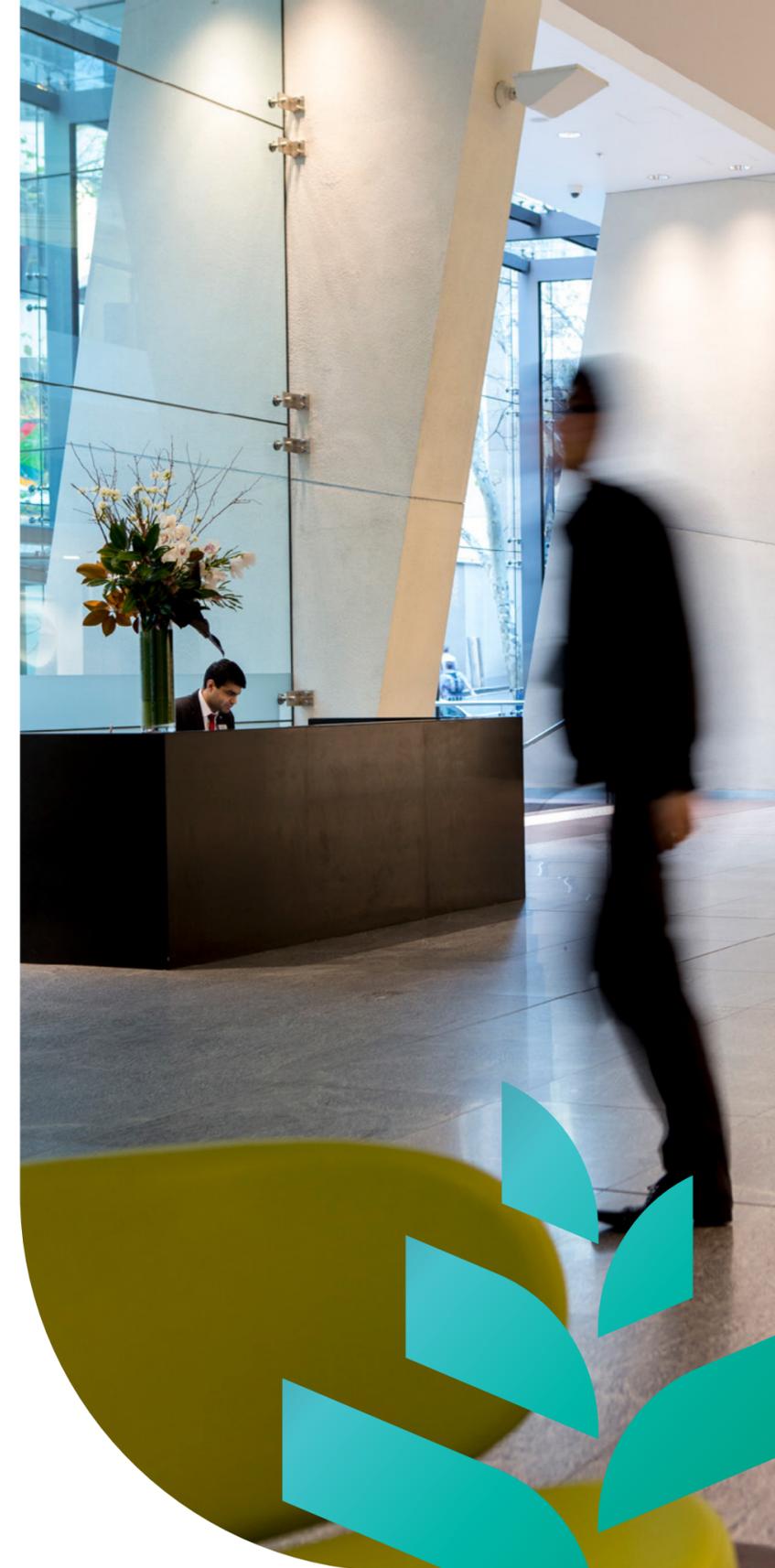
Key data from the surveys is outlined on the following page in the supplier snapshot.



Supplier engagement through ongoing due diligence, including third party audits and subcontractor monitoring

Where we have identified an industry hot spot or we have a major supplier, we may also undertake third party audits. While we recognise that audits can have a range of limitations, they enable us to better understand the processes and practices of key suppliers. Our FY24 statement explains our work to address findings from six audits of cleaning and security providers. In FY26, we intend to conduct audits on selected capital works suppliers.

As part of our facilities management procurement framework, we closely oversee the engagement of subcontractors by our primary suppliers, acknowledging that subcontracting can heighten modern slavery risks by diminishing transparency over labour conditions and employment practices. To mitigate these risks, our suppliers are required to formally declare any subcontractors they propose to engage within our managed buildings. These subcontractors are subsequently onboarded onto Investa's facilities management system, enabling us to actively monitor their involvement and verify compliance with all requisite insurance and workers' compensation obligations. This process strengthens our oversight and promotes responsible labour practices throughout our supply chain.



TAKING ACTION

Supplier snapshot

The supplier data below is based on relevant suppliers' responses to due diligence surveys administered through the PCA supplier platform over FY25. The data provided reflects the percent of respondents to each question.

81%

Have undertaken a modern slavery risk assessment, of these 19% have engaged a third party to support this process. A further 42% indicate they have a general understanding of modern slavery risks but have not undertaken a specific assessment.

83%

Have briefed the senior leadership team and board of directors on human rights and modern slavery risks.

39%

Are required to report under the MSA, with another 10% of suppliers planning a statement within the next 12 months.

77%

Directly recruit select and hire all workers.

74%

Provide training to current employees or suppliers about human rights and modern slavery, with a further 17% planning to do so over the next 12 months.

25%

Manufacture products outside Australia or source products and services internationally that contribute to the delivery of products and services within Australia.

Over FY25, we also identified a correlation between the modern slavery hot spot suppliers and carbon and nature hot spot suppliers, particularly in the areas of property maintenance, construction materials and processes, travel and accommodation, office furniture and supplies and ICT supplies. We are exploring how we can take an integrated approach to engaging with these suppliers around both modern slavery and environmental issues.

CASE STUDY

Due diligence in different contexts

We recognise the importance of adapting our supplier due diligence approaches to different supplier contexts.

For example, during the reporting period, we entered into a multi-year energy services agreement with an energy company. The agreement is underpinned by a Power Purchase Agreement (PPA) between the company and a wind farm. As part of this process, we engaged with the company to learn more about their approach to modern slavery risk management, the construction of the wind farm notionally aligned to the Investa agreement as well as current practices in new wind farm developments. The company also agreed to complete our supplier due diligence survey. This process has increased our understanding of how modern slavery risks can arise in the context of renewable electricity procurement and PPAs, and we will draw on lessons learned to inform future engagement in this area.



Photography: Origin



Our stakeholder engagement approach



Internal stakeholder engagement

Our primary tool for engaging with our employees about modern slavery is through our training program. We provide e-learning compliance training to all employees. The training covers a range of issues, including modern slavery. The modern slavery element of the training includes information about what modern slavery is, countries where risks are higher and potential key areas of modern slavery risk in Investa's supply chains. We also include modern slavery content in our Sustainability Leaders Series for all employees.

In addition to the general training for employees, we also developed targeted training for procurement leads across Investa. This training involves guidance about modern slavery red flags to be aware of and how to respond if red flags are identified.

The Investa Sustainability School has further e-learning modules on modern slavery, that include a specific focus on the property sector, as well as how employees can take individual actions in their daily lives to understand and address modern slavery. As outlined in earlier in this statement, our governance framework also provides us with pathways to engage with senior leadership and key governance bodies such as the IMHARC around modern slavery.



External stakeholder engagement

Engaging with our external stakeholders can support us to better identify, assess, and address our modern slavery risks and understand their expectations. Through engagement with our peers in the sector, we can also build our understanding of how our modern slavery response aligns with our peers and collaborate to share learnings. We have a range of engagement channels with our external stakeholders that could allow us to raise issues related to modern slavery where appropriate.

Engagement with our investors

Our engagement with investors provides an opportunity to discuss modern slavery, including:

- Quarterly investor updates
- ICPF Group Annual General Meeting, which provided an update about our modern slavery response
- Investment committee updates
- Responses to investor due diligence surveys on the topic. These surveys typically include questions about how we integrate modern slavery and wider human rights considerations into our investment decision-making; how we assess modern slavery risks; and the actions we take to manage these risks.

Engagement with our customers

Our customers are the tenants in our buildings. We engage with our customers in a range of ways which can provide opportunities for us to discuss modern slavery, including:

- Building Sustainability Committee meetings
- Tenant newsletters
- Building Occupant engagement programs
- Customer surveys.

Engagement with our industry peers

During the reporting period, Investa continued to be an active member of the PCA Modern Slavery Working Group.

The PCA Modern Slavery Working Group met monthly over the reporting period, with meetings covering topics such as: engagement with people who have lived experience of modern slavery; grievance mechanisms; indicators of workers' vulnerability to exploitation; and supplier and supply chain engagement, including audits.

These meetings also provided an opportunity for us to engage directly with external experts, who provided briefings and presentations on key issues. This included a presentation from the NSW Anti-Slavery Commissioner about issues including modern slavery risks in renewables value chains, as well as a presentation from the Federal Anti-Slavery Commissioner about his priorities and mandate. The Commonwealth Attorney-General's Department also presented on modern slavery reporting trends. Other external experts engaged through the working group included representatives from a major supermarket, who explained their approach to responsible sourcing. These presentations have informed our understanding of modern slavery risks and evolving good practice, including around reporting pathways.

In addition to launching two important resources around measuring impact and understanding indicators of vulnerability, Investa and other Working Group members also received a summary of third-party resources related to modern slavery and broader human rights due diligence.



Support for development of modern slavery resources

Through the PCA Working Group, Investa was pleased to support the development of the two guides below.

Impact metrics for addressing modern slavery in property and construction

This guide was launched during the reporting period and sets out metrics that Australia's property and construction sector can use to track and demonstrate impact. People with lived experience were consulted during the project, with their feedback helping to shape the metrics.

Indicators of vulnerability to modern slavery in property and construction

This guide was developed during the reporting period and launched in early FY26. It aims to support companies to understand how vulnerability contributes to exploitation and identifies practical steps to prevent harm and support affected workers. The guide draws on insights from workers with lived experience in the property and construction sector.



Our grievance management and remediation approach

Through our Human Rights Policy, we have committed to respect human rights.

As part of our commitment, we recognise that we are expected to provide for, or cooperate in, the remediation of human rights harm such as modern slavery where we identify we caused or contributed to the harm. To date, Investa has not identified any instances of modern slavery. We do, however, recognise modern slavery could occur in our supply chains without being reported to us.

Our employees, tenants and suppliers can raise concerns about issues including modern slavery through our whistleblower portal, via email or directly to specified Eligible Recipients such as our People and Culture Team or our auditors.

Complaints can be made anonymously. Investa has developed training for our procurement leads across the business which focuses on identifying and responding to modern slavery red flags.

We have also worked to raise awareness of our whistleblower mechanism among suppliers' workers in our buildings. This involved developing whistleblower signage in seven key languages (Nepali, Spanish, Thai, Hindi, Bengali, Portuguese and Arabic), which is displayed throughout our buildings. We also set expectations for our suppliers as part of our procurement requirements to provide their employees with an 'avenue to lodge grievances without fear of reprisal', which could include grievances related to modern slavery or other labour rights harm.

How we would respond to a modern slavery grievance

We have continued to develop guidance to support us to investigate, and where appropriate remediate, a modern slavery complaint, in line with our human rights commitments.

The guidance is aligned with the UNGPs and outlines how we could triage a complaint relating to our operations or supply chain and develop an investigation approach that is consistent with a human rights-based approach (including considerations for referring allegations to authorities). It also provides guidance on how we could determine our approach to remediation of a modern slavery incident in line with the UNGPs depending on our involvement in the harm, and how we may use or build our leverage with business partners where the incident is in our supply chain or other business relationship. The guidance also sets out a number of principles, which will guide our response, including in relation to prioritising potential victims' welfare and taking an approach focused on the risk of harm to people, recognising that every incident will be unique and require a tailored response, and seeking ways to support victims to participate in any remediation process.

If a grievance is raised we implement the following process, which is based on the UN Guiding Principles



How we assess the effectiveness of our actions

Investa considers an effective response to modern slavery to be where, through our governance, procurement and education actions, we are able to:

- Identify and appropriately manage modern slavery risks in our supply chain; and
- Respond appropriately to any identified instances of modern slavery or other issues that could lead to modern slavery.

During the reporting period, we undertook a number of actions that assisted us to better understand the effectiveness of our modern slavery response and identify opportunities for further improvement. These actions aligned with our three KPI focus areas, which were developed in FY24 in line with internal audit recommendations.

Focus area

Our impact

Identify supplier risk and characteristics

We monitor key quantitative metrics, such as the number of suppliers completing our modern slavery due diligence questionnaire.

We continued to engage with suppliers through our due diligence surveys and have identified capital works suppliers to be the next focus for social audits of our supply chain in FY26.

We also reviewed and updated our Supplier Code of Conduct, which sets out our expectations for suppliers and our Procurement Policies and procedures to enhance our internal approach.

Collaborate with and educate employees, suppliers and customers

We monitor employee and supplier training in modern slavery and customer engagement on our efforts to address modern slavery.

We continued to provide modern slavery training for our employees. Relevant suppliers were also able to access training through the Informed 365 supplier platform and events undertaken by Informed 365.

We also continued to engage with external stakeholders, including through the PCA Working Group. This collaboration helps to inform our own engagement with workers and suppliers.

We engage with our customers on our approach to modern slavery through tenant sustainability committee meetings, quarterly reports with investors and responding to tenant and investor modern slavery due diligence surveys.

Address risks and process improvements

We identify any reports of modern slavery made to the business and subsequent investigations and remediation actions taken by the business.

We did not identify any specific reports or concerns relating to modern slavery. We continued to promote our grievance mechanism and worked to finalise guidance to support our response to any future modern slavery report or concern we might identify.



Our approach to date



Further information about these initiatives is set out in our previous Modern Slavery Statements, which can be found [here](#).



Appendix

How this Statement aligns with the MSA's mandatory reporting criteria

This Statement was prepared to meet the mandatory reporting criteria set out under the MSA. The table below identifies where each criterion of the MSA is addressed in this Statement:

- 1 Identify the reporting entity ([page 3](#))
- 2 Describe the reporting entity's structure, operations and supply chains ([pages 5-6](#))
- 3 Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls ([pages 8-9](#))
- 4 Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes ([pages 10-16](#))
- 5 Describe how the reporting entity assesses the effectiveness of these actions ([page 17](#))
- 6 Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement) ([page 15](#))
- 7 Provide any other relevant information ([page 18](#))



Contact

All enquiries can be directed to:



Investa

Level 30
420 George Street
Sydney NSW 2000

T +61 2 8226 9300

enquiries@investa.com.au
investa.com.au

